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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE CALDERON-CAMPOS, ALBERTO  
GOMEZ-SANTIAGO, BYRON ADILIO  
ALFARO-SANDOVAL, FRANCISCO  
JAVIER TORRES MORA, JOSE ANGEL  
BELTRAN-CHAIDEZ, AND MARK  
GARCIA,

Defendants.

CASE NO. 1:22-CR-00131-DAD-BAM

STIPULATION REGARDING EXCLUDABLE  
TIME PERIODS UNDER SPEEDY TRIAL ACT;  
AND ORDER

DATE: August 10, 2022

TIME: 1:00 p.m.

COURT: Hon. Magistrate Judge Barbara A. McAuliffe

**STIPULATION**

Plaintiff United States of America, by and through its counsel of record, and defendants, by and through defendants' counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on August 10, 2022.
2. By this stipulation, the parties move to continue the status conference until November 9, 2022, or the Court's earliest convenience, and to exclude time from calculation under the Speedy Trial Act between August 10, 2022, and November 9, 2022.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) Initial discovery was provided to defendants on or about May 20, 2022, consisting of 1,082 Bates-stamped items including wiretap data, reports of investigation, photographs,

1 recordings of post-arrest interviews, and a summary of defendant's criminal history.

2 b) Counsel for defendants desire additional time to review discovery, consult with  
3 their clients, conduct investigation and research related to the charges, and to otherwise prepare  
4 for trial.

5 c) Counsel for defendants believe that failure to grant the above-requested  
6 continuance would deny them the reasonable time necessary for effective preparation, taking into  
7 account the exercise of due diligence.

8 d) Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendants in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of August 10, 2022 to November 9,  
13 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it  
14 results from a continuance granted by the Court at the defendants' request on the basis of the  
15 Court's finding that the ends of justice served by taking such action outweigh the best interest of  
16 the public and the defendants in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: August 1, 2022

PHILLIP A. TALBERT  
United States Attorney

/s/ CHRISTOPHER D. BAKER  
CHRISTOPHER D. BAKER  
Assistant United States Attorney

/s/ DAVID A. TORRES  
DAVID A. TORRES  
Counsel for defendant Jorge Calderon-Campos

/s/ MICHAEL E. MITCHELL  
MICHAEL E. MITCHELL  
Counsel for defendant Alberto Gomez-Santiago

/s/ FATIMA RODRIGUEZ  
FATIMA RODRIGUEZ  
Counsel for defendant Byron Adilio Alfaro-Sandoval

/s/ PATRICK S. AGUIRRE  
PATRICK A. AGUIRRE  
Counsel for defendant Francisco Javier Torres-Mora

/s/ ALEKXIA L. TORRES STALLINGS  
ALEKXIA L. TORRES STALLINGS  
Counsel for defendant Jose Angel Beltran-Chaidez

/s/ MARK A. BROUGHTON  
MARK A. BROUGHTON  
Counsel for defendant Mark Garcia

**ORDER**

IT IS SO ORDERED that the status conference is continued from August 10, 2022, to **November 9, 2022, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: August 2, 2022

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE